Exhibit K

Email re Confidentiality Waiver

Suzanne Elovecky

From:	Kate Klaus <KKlaus@maddinhauser.com>
Sent:	Thursday, July 13, 2023 8:09 AM
To:	Suzanne Elovecky
Cc:	Cooper, Howard; Joseph M. Cacace (jcacace@toddweld.com); Neil Nicholson
Subject:	[EXTERNAL] RE: de Laire v. Church Militant, et al.

We waive confidentiality to the text, only.

On Jul 12, 2023 6:22 PM, Kate Klaus <KKlaus@maddinhauser.com> wrote:
Suzanne -

I don't know what concerns you may or may not have about the production, because you haven't articulated any concerns and we can't imagine what they may be.   My client simply forgot that, in 2018, Mr. Balestrieri used tommoore as a pseudonym.   Months ago produced hundreds of other documents with other pseudonyms he used and, like the 2018 emails in the recent production, none are related in any way to this case.   Also, you have mischaracterized Mr. Voris's admonishment to Mr. Balestrieri **to tell the truth** as a "threat" and misrepresented our conversation about Mr. Voris's text message in what charitably appears to be an effort to distract from the considerable work that needs to be done before we try this case.

I'll discuss your request with my clients. The PO gives us 15 days to meet and confer on your objection to our designation. It shouldn't take that long.

- Kate

From: Suzanne Elovecky <selovecky@psh.com>
Sent: Wednesday, July 12, 2023 5:41 PM
To: Kate Klaus <KKlaus@maddinhauser.com>
Cc: Cooper, Howard <hcooper@toddweld.com>; Joseph M. Cacace (jcacace@toddweld.com) <jcacace@toddweld.com>; Neil Nicholson <neil@nicholson-lawfirm.com>
Subject: de Laire v. Church Militant, et al.
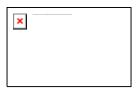**Importance:** High

[EXTERNAL EMAIL]
Kate:

As I'm sure you appreciate, we remain deeply concerned about the circumstances surrounding your most recent production, including but not limited to (a) the threat made to Mr. Balestrieri concerning his potential testimony, (b) the fact that these "tommoore@churchmilitant.com" documents were not identified and produced sooner, despite Voris's testimony concerning his knowledge and usage of the "Tom Moore" pseudonym, and (c) that the production remains incomplete. We have no choice but to raise these concerns with the Court, and intend to do so this week along with our update concerning today's deposition.

You have designated CM 1462 (the June 15 text from Voris to Balestrieri) "confidential," along with the remainder of that production. As you know, Paragraph 3 of the protective order only permits a designation of "confidential" for documents which were determined in good faith to "contain information protected from disclosure by statute or that should be protected from disclosure as confidential personal information, trade secrets, personnel records, or

1

commercial information." CM 1462 does not meet this standard. Please advise ASAP if you agree (a) to remove that designation, or (b) to assent to our filing the document in full notwithstanding the designation, pursuant to Section 6(b) of the protective order.

In the event you do not agree, please consider this email an objection pursuant to Section 8 of the protective order. Accordingly, please let me know when this week you are available to meet and confer concerning this document.

Suzanne M. Elovecky
Partner
Partridge Snow & Hahn LLP
30 Federal St.
Boston, MA 02110
t: 857-214-3097 · f: 617-292-7910
selovecky@psh.com
Learn more about our lawyers at psh.com